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July 29, 2022

VIA ECF

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 518
New York, New York 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 07/29/22

Defendant is to maintain communication with the
Pretrial Services Officer throughout the entirety of
his trip.

Re: *United States v. Moises Lluberres*, 20-cr-493 (VSB)

Dear Judge Broderick:

I write on behalf of defendant Moises Lluberres in the above-referenced matter to respectfully request the temporary modification of his conditions of pretrial release to permit him to travel to Houston, Texas on August 1, 2022 – August 5, 2022 to attend an important in person meeting for his employment.

I have discussed this request with the government and Pretrial Services. The government, by A.U.S.A. Nicholas Chiuchiolo, does not object. Pretrial Services (Officer Harmon) objects, but PTS' objection is based only on the Office's blanket policy to object to overnight travel for any defendant subject to location monitoring. PTS Officer Harmon confirmed, however, that Mr. Lluberres has been fully compliant with his conditions of release throughout his nearly two-year period of supervision.

Respectfully Submitted,

MEISTER SEELIG & FEIN LLP

/s/ HEM
Henry E. Mazurek
Ilana Haramati
Counsel for Defendant Moises Lluberres

cc: Counsel of Record (*via ECF*)